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**EXPEDITED ACTION REQUESTED  
BEFORE THE  
SURFACE TRANSPORTATION BOARD**

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**STB DOCKET NOS. MC-F-20904; MC-F-20908; MC-F-20912**

**PETER PAN BUS LINES, INC.—POOLING—GREYHOUND LINES, INC.**

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**MOTION OF COACH USA, INC. AND MEGABUS NORTHEAST, LLC TO FILE A  
REPLY TO JOINT RESPONSE OF GREYHOUND LINES, INC. AND PETER PAN BUS  
LINES, INC.**

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Attorneys for Coach USA, Inc. and  
Megabus Northeast, LLC

July 1, 2011

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On June 28, 2011, Greyhound Lines, Inc. ("GLI"), and Peter Pan Bus Lines, Inc. ("Peter Pan") filed a Joint Response to the June 16, 2011 submissions of Coach USA, Inc. and its subsidiary Megabus Northeast, LLC (together, "Megabus") concerning unauthorized pooling operations then announced by GLI and Peter Pan, and now being conducted by them. Among the operations at issue, addressed in one of the Megabus submissions, is the pooled operation of these two carriers between Philadelphia and Boston, apparently conducted via Newark, NJ.<sup>1</sup>

Megabus hereby moves the Board for permission to file the attached reply to the Joint Response of GLI and Peter Pan. Megabus understands that the Board's rules do not normally permit a reply to a reply. However, GLI and Peter Pan did not seek the Board's permission to operate the pooled service in question. The Joint Response thus presents, for the first time in this

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<sup>1</sup> The second submission concerns an expansion of pooled GLI/Peter Pan operations to/from Newark, an intermediate point in the approved New York-Philadelphia pooling agreement between those two carriers. The separate issue of whether GLI and Peter Pan can initiate and terminate new service from an intermediate point has been previously addressed in submissions pending before the Board in the same dockets identified above, including in a March 30, 2011 reply tendered for submission by Megabus. That issue is briefly noted in the attached reply in connection with the Philadelphia-Boston issue.

proceeding, a purported explanation of the basis on which GLI and Peter Pan claim the right to operate the pooled Philadelphia-Boston service. Specifically, these carriers make the novel and apparently unprecedented claim that they can combine points authorized to be served in two separate pooling agreements (Philadelphia in one, Boston in the other) to create a new Philadelphia-Boston route via an intermediate point named in one of the two approved pooling agreements.

Because Megabus has not previously had the opportunity to comment on this novel argument, and because the argument has significant implications with respect to geographic scope of permissible pooling arrangements, Megabus submits that it should be allowed the opportunity to offer the attached reply. Megabus submits that the Board will benefit from this reply in its deliberations on this matter.

For these reasons, Coach USA and Megabus urge the Board to accept the attached reply for filing and to act promptly on these matters.

Respectfully submitted,



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July 1, 2011

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 1st day of July 2011 served a copy of the foregoing Motion on counsel for Greyhound Lines, Inc. and Peter Pan Bus Lines, Inc. as follows:

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